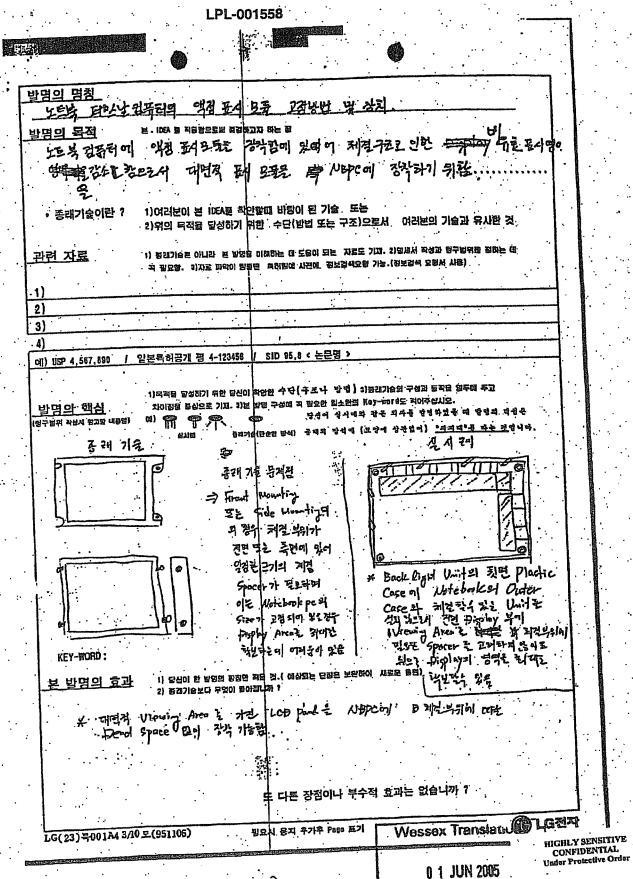
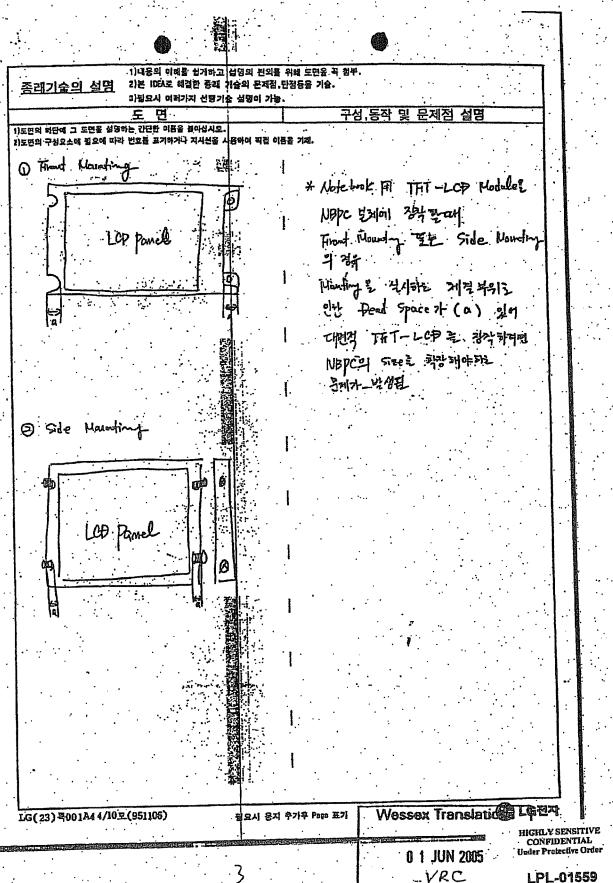
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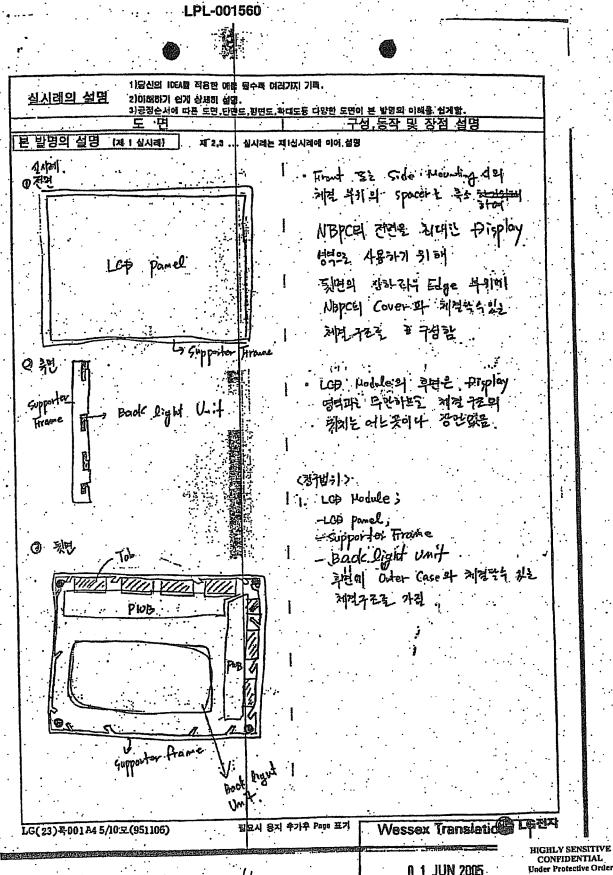
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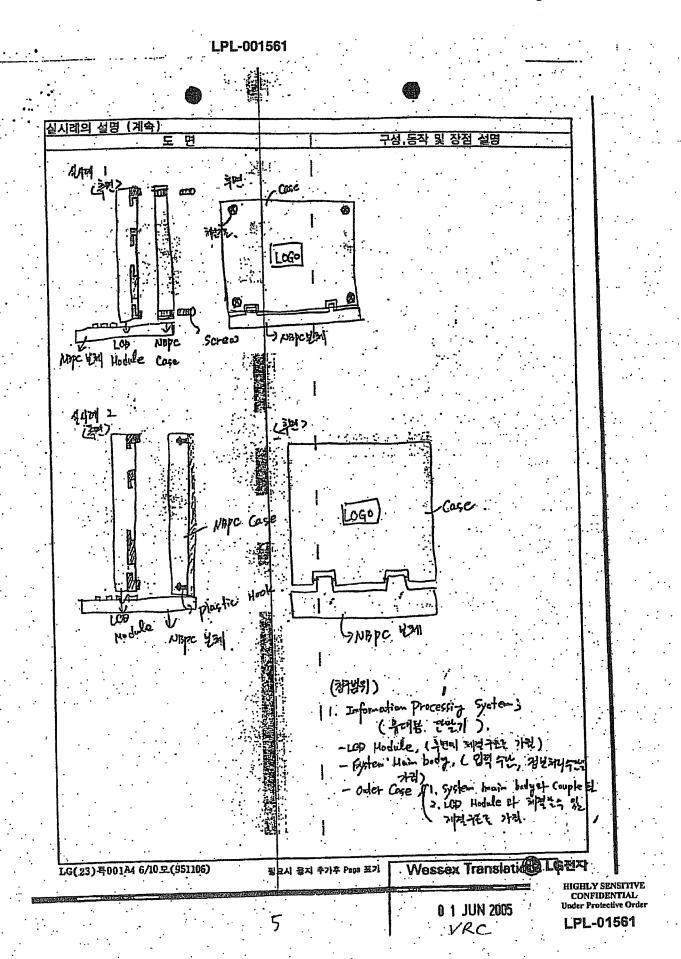
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LPL-01562

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EXHIBIT 14







language consultancy

translation

interpreting.

typesetting, dto ^{p.} artwork

editing & We, Wessex Translations Ltd., a British limited company established in 1972 for the proof-reading purpose of providing translations between languages, being corporate members of the Institute of Translation and Interpreting, the independent professional association of accredited qualified, practising translators and interpreters in the United Kingdom and members of the Association of Translation Companies, do hereby declare that, to the best of our knowledge and belief, the attached documents are true and accurate English translations of the two original Korean Invention Disclosure Forms, both dated October 13, 1998 and relating to Application No. AW 98-221 and Application No. AW 98-222 respectively, our job reference 13850.

translation & translation memory management

Signed at Romsey, this 1st day of June 2005

software Iocalisation

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transcription (audio & video)

> telephone marketing

voice-overs

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All work is undertaken in accordance with our conditions of service overleaf
Company registration n°: 4167127 • VAT registration n°: GB 329 9351 28
Registered address: Parmenter House • 57 Tower Street • Winchester • SO23 8TD • UK

LG Electronics LCD DIVISION Confidential – Internal Use Only

Invention Disclosure Fórm

Date Received: October 13, 1998

Application No.: AW 98-221 GSC2 Code:

International Ref. No.: IPC Classification:

Signature	e e e e e e e e e		Patent Team	·
	Inventor	Supervisor		Supervisor
	L		Officer	
1	XXX		•	

	Inventor	Name Kor. Eng. Jong-hwan Kim, Young-woo Cho Chin.
		Dept.: Patent Employ 22062/40154 Tel. 7418/7413 No.
		* Inquiries to Patent Team when joint invention*
	Title	Method and apparatus for mounting an LCD display module on a notebook computer
	Description	A mounting method for attaching an LCD module to a notebook computer, which eliminates dead space in the display area and makes it possible to accommodate larger LCD modules
	References	□ Patent DB (1. LGP 2. KRP 3. USP) □ Other patent-related material
	(Attached	□ Research paper □ Journal/Review □ Others
	materials)	LJ ANDONANT PROPERTY AND
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100	• • • • • • • • • • • • • • • • • • • •	ex. USP 4,567,890
		Patent Publication No. JP 4-123456 A
	Related	☐ New project (Project name:) a Improvement to existing production
	Project	technology Other
	Development .	☐ Development project ☐ Technology research ☐ Commercialization research
	Stage	☐ Design planning ☐ Design underway ☐ Pilot production ☐ Production ☐ Released
	Nature of	☐ Micro-invention ☐ New business project invention ☐ Invention relevant to
	Invention	other LG Electronics business division (8)
	Urgency of	☐ Medium ■ Urgent (reasons for urgency: A design-around invention to sid
	Patent	mounting)
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LG (23) Teuk001A4 1/10Mo (951106)

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Method and appa				•
•	ratus for mounting a	n LCD display m	odule on a notebo	ok computer
Objective of the Invention	Technological issues w	hich the invention is	s attempting to resolv	e or remedy.
To provide a meth educing unusable portion	nod for mounting an us of display area to	LCD module to a enable the fitting	notebook comput of larger modules	ter top case,
*What is prior art?	Technologies or of achieve the stated of technologies or desired.	lesigns used as a n ojective of invention	neans (method or co on, which are simil	omposition).to .
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2. 3. 4.				
Ex.: USP 4,567,890/ Pater				
Key Features of the Invent			•	
1. Apparatus or metho	od created by the inve	ntor as a means to	achieve the stated	objective of
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PL-001568

Prior Technologies

Shortcomings of Prior Technologies:

Front or side mounting methods, having mounting areas on the front or on the sides, require spacers. Spacers occupy much of the display area and result in reduced display areas for notebook computers, in particular with compact models.

By placing mounting units on the plastic case on the rear of the backlight unit, joining the module to the outer case of a notebook computer, the need for spacers is eliminated and optimal display area is secured in the viewing area.

Keywords:

Benefits of the Invention

- 1. State only benefits offered by the invention (expected shortcomings may be remedied for a new patent application)
- 2. State the improvements brought by your invention.

Enables the installation of large-viewing-area LCD panels on notebook computers by eliminating dead space created by existing mounting methods.

Are there additional benefits or advantages offered by the invention worth mentioning?

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	When necessary, more than one prior technology	Description of Components, Operation and Shortcomings
1.	Front mounting	
2.	. Side mounting	
Fron	outers create dead space (a) due to the posi	e for assembling TFT-LCD modules for notebook tions of the mounting areas, driving up the overall
	outer size.	

LG (23) Teuk1A4 4/10Mo (951106) Add paper if necessary for pagination. LG Electronics

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PL-001570

Description of Embodiments

- 1. Describe as many embodiments of the invention as possible.
- 2. Description should be detailed and easy to understand.
- 3. Drawings including sectional view, top view and enlarged view improve the reader's understanding of the description of invention.

Description of Components, Operation and Advantages:

Drawings '

Description of the Invention (Embodiment 1) Description of other embodiments may be added on at the end of this one.

Embodiments

1. Front View

2. Side View

3. Rear Viev

Mounting areas, used to join the module with the top case of a notebook computer, are created on the back of the LCD module at the upper and lower edges and on either side in order to reduce the space occupied by spacers in the mounting areas when using front or side mounting methods and thus secure maximum display area.

Mounting areas could be anywhere on the back of the LCD module as they do not interfere with the display area.

Claims:

- 1. LCD module
 - LCD panel;
 - Supporter frame
 - Backlight unit with mounting areas for joining to the outer case on the back

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Description of Components, Operation and

Advantages ·

Drawings

Embodiment L.

[Captions: Side View:

Body of notebook computer, LCD module, Computer case

Rear View:

Mounting area, Case, Logo, Body of computer]

Embodiment II.

[Captions: Side View:

LCD module, Notebook computer case, Plastic hook, Body of computer

Rear View:

Logo, case, Notebook computer case]

- Information processing system (portable device);
- LCD module (with mounting areas on the back)
- System main body (with input and information processing devices)
- Outer case:
 - 1. Matching the system main body
 - 2. Equipped with apparatus for mounting an LCD module

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Description of Embodiments (cont'd)

Description of Components, Operation and Advantages

Drawings

Description of Components, Operation and Advantages

Summary of the interview with Product Planning Dept. Manager Yeong-un Bang (phone interview on Oct. 12):

- Back mounting entails no known technical issues.
- Using back hinges could be a solution as well. While this method enlarges usable display area, the only drawback would be the thickness of the final assembly. Thickness is a sensitive issue for set makers. A back-mounting tray may be an effective alternative as a solution to design-around the side mounting method. The development team or the makers will be advised when necessity arises.

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양 도 중

양수 인

주 소 : 서울특별시 영동포구 여의도등 20번지

성 명 : LG전자주식회사 대표이사 사장 구 자 홍

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 공동 출원시는 발명자(고안자)당 1매씩 양도중만 추가하여 첨부 바랍니다.

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양'수 인

주 소 : 서울특별시 영등포구 여의도등 20번지

성 명 : LG전자주식회사 대표이사 사장 구 자 홍

다음의 발명(고안)에 관하여 특허(실용신안등록)를 받을 수 있는 권리물 귀하에게 양도합니다.

199 8 년 /0 월 /2 일

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양도인	주민	등록번호	630	408	}	171	\$ 61	6			<u>.</u>		<u> </u>
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1.사건의 표시 2.발명(고안)의 명칭

* 공동 출원시는 발명자(고안자)당 1매씩 양도중만 추가하여

첨부 바랍니다.

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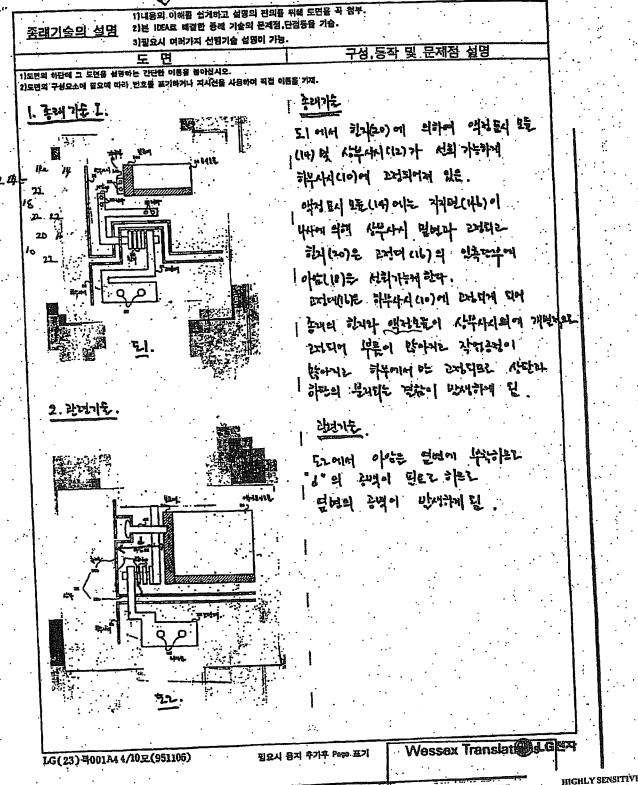
LPL-01576

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	A CONTRACTOR OF THE PROPERTY O	
12	명의 명원 노트북 떠스팅 컴퓨터의 액처B4 토로의 고청바반 및 각시.	
	크의 목적 및 IDEA 및 적용병으로의 제공하고자 하는 점 노트북 컴퓨터 에서 LCD module 라 노트북의 Top case 로운 게나키 견해	
	하고 공처의 강조화 당 나는 감조를, 구현지 수가의 회사는 . 유리에서 수가의 회사는 . · 종래기습이란 ? 1)여러분이 본 IDEA를 작안함때 바탕이 된 기술 또는 2)워의 목적을 덮성하기 위한 수단(방법 또는 구조)으로서 여러분의 기술과 유사한 것	
라	경 지금 1) 중계기술은 아니라 본 방향당 이용하는 데 도용어 되는 지율도 기지, 2)행세서 작성과 행구병위한 현하는 데 꼭 필요함, 3)자료 파악이 원호면 즉하되어 시원에 행보검색으로 가능 (정보검색 요령서 사용)	•
1)		<u></u>
<u>2)</u> 3)		
4)) NSP 4.557:890 / 일본록허공7章 평 4-123458 / SID 95,8 < 논문명 >	
-	1)부적당 당성하기 위한 당신이 확인한 수단(구조나 방법) 1]중레기술의 구성과 중작을 업무해 두고. <u>나당의 핵심</u> 차이없음 당신으로 기교, 3)본 방병 구성에 꼭 필요한 최소현의 Key-mord도 확여주십시오. 당선이 선시대화 강은 최수를 방병하였는 때 방법의 핵심은 당선이 선시대화 강은 최수를 방병하였는 때 방법의 핵심은 전체적 자성시 열교병 내용함! 예! 등 보기 합인단순단 방식) 문학의 방식이 (모양이 상광경이) <u>"겨기대"를 다는 것</u> 입니다	
	1. 노트북 컴퓨터의 Top case 뒷턴에 Hinge Arm 은 네라이 LUD Module 의 문서부분 뒷보다 전혀하는. 2. Top case 뒷데에서 System의 Hinge Arm과 LUD Module 은	
	3. Top case 각 LCD module 의 경하시 연면 가 아버트면 의 금메우 한다 한다 있으므로 어떤지 LCD의 개택한 가능계하다.	
	KEY-MORD: Back Hinge Arm. Module 734.	
	보 발명의 효과 1) 당신이 한 발표의 광질만 제를 것.(예상되는 단점은 보면하여 보로은 용원) 1) 문건가요보다 무엇이 됩어됩니까 ? 1. Hinge Arm 라 Top CASE 후 한번의 거친으로 이웃하시므로서 수준 계약 기업으로 이웃하시므로서 수준 기업으로 기업으로 기업으로 이웃하시므로서 수준 기업으로 기업으로 기업으로 기업으로 기업으로 기업으로 기업으로 기업으로	· · · · · · · · · · · · · · · · · · ·
	용지의 가다되가 이웃위신. 2. LLD hodule 라 Top case 얼마 에는 아무 부분의 음액은 격매분다 중에서 것같아들로써 LLD 의 유현대저 증가의 로바가 있음.	走.
	또 다른 장점이나 무수씩 효과는 없습니까 !	
1	LG(23)문001A4 3/10 모(951106) 필요시 용지 추가후 Pee 표기 Wessex Translati	LGM

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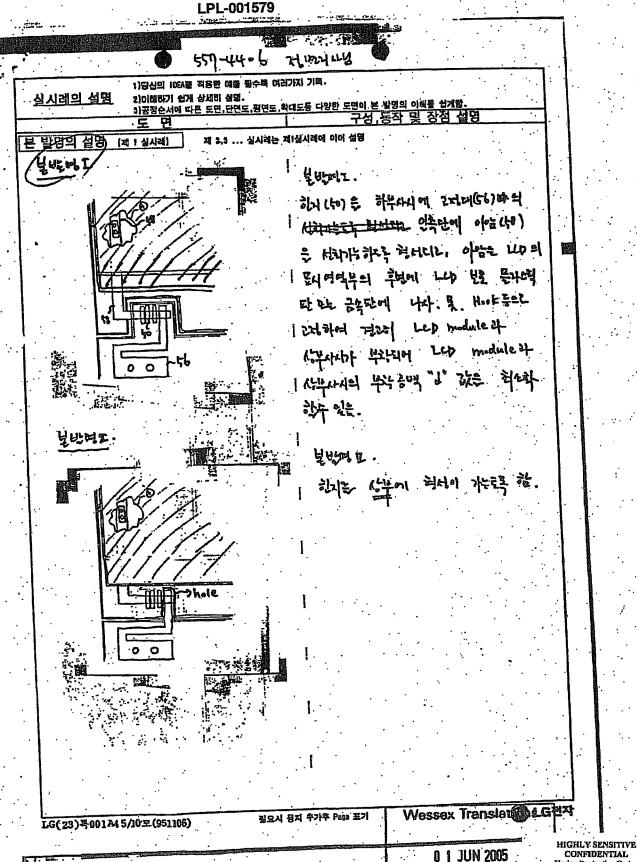


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EXHIBIT 16







language consultancy

translation

interpreting

typesetting, dtp ^{p.} artwork

editing & We, Wessex Translations Ltd., a British limited company established in 1972 for the proof-reading purpose of providing translations between languages, being corporate members of the Institute of Translation and Interpreting, the independent professional association of accredited qualified, practising translators and interpreters in the United Kingdom and members of the Association of Translation Companies, do hereby declare that, to the best of our knowledge and belief, the attached documents are true and accurate English translations of the two original Korean Invention Disclosure Forms, both dated October 13, 1998 and relating to Application No. AW 98-221 and Application No. AW 98-222 machine respectively, our job reference 13850.

machine transiation à transiation memory management

Signed at Romsey, this 1st day of June 2005

software: iocalisation

> language Victoria Conder training (Translation Manager)

transcription (audio 3 video)

> telepnone marketing

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Registered address: Parmenter House · 57 Tower Streat · Winchester · SO23 8TD · UK

LG Electronics LCD DIVISION Confidential - Internal Use Only

Invention Disclosure Form

(97-12899 14278 97-20550 97-45880)

Date Received: October 13, 1998

Application No.: AW 98-222 GSC2 Code: International Ref. No.: IPC Classification:

Signature.			Patent Team	: .
	Inventor	Supervi	Reporting	Supervisor
٠.		SOC	Officer	
	Yong Woo			

	• :					
	Inventor	Name: Kor.		hwan Kim, Youn		
		Dept.: Patent	Employ	22062/40154	Tel.	7418/7413
		Gr./Section Part	No.,			***
			ļ. ["]		<u> </u>	
	. ,	* Inquiries	to Patent Te	am when joint inve	ntion*	
	Title	Method and apparatus fo	or mounting	an LCD display	module	on s
		notebook computer	:	· · · · · · · · · · · · · · · · · · ·	٠.	
	Description	A mounting method for a	attaching an	LCD module to a	notebo	ok computer
		using a hinge arm placed	behind the	module, which siz	mplifies	assembly
		and enables the fitting of	larger LCD	modules .	· · · · · · · · · · · · · · · · · · ·	
	References	☐ Patent DB (1. LGP 2. I			elated in	iaterial
	(Attached	□ Research paper □ Journ	al/review [Others	<u> </u>	
	materials)	Korean Patent Applicati	on No. 97-20)550 (Side long-ar	m binge	=)
					. ••	
		ex. USP 4.567,890.			. •	
aidentije i	•	Patent Publication No. JP	4-123456		<u> </u>	<u> </u>
	Related	□ New project (Project na	me:)	☐ Improvement to	o existin	g production
	Projects	technology [] Others	, •	· · ·		
	Development	☐ Development project ☐	Technology	research m Comm	ercializ	ation research
	Stages	□.Design planning □ Desi	gn underway	□ Pilot productio	n 🗆 Pro	duction 🗆
		Released	<u> </u>	<u> </u>		
	Nature of	■ Micro-invention □ New	business pro	oject invention 🛛 I	nventior	relevant to
	Invention	other LG Electronics busin	ness division	(s) .	• • • •	
	Urgency of	☐ Medium ■ Urgent (reas	sons for urge	ncy: A design-aro	und inv	ention to the
	Patent	side mounting method u	sing side lop	g-arm hinges)		•
	Application	· · · · ·		• •	·	<u> </u>
	International	■ Necessary (reasons: A	lesign-arou	nd invention to co	mpetito	rs' side
	Patent -	mounting patents) Dur			. •	
	Application		•			·
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	Reference	☐ Yes. 1. Title of reference materials:			
	Research	2. Searched in □ LG DB □ USP □ JP □ Research papers □ Others ()			
		□ No materials available			
		□ No (state reasons:			
	Purpose of	.□ Defensive □ Creation of patent family □Monopoly			
	Patent				
	Application				
	Request for	☐ At the time of application ☐ To be determined at a later time			
·	Examination	(state reasons:			
	Patent	☐ Yes ☐ To be determined at a later Overseas agent (s)			
	Application.	time 🗆 N/A			
To be	Overseas				
filled out	Prior	☐ Yes (1. Prior patent application No.: 2. Application Date			
by the	Application in Korea	3. Agent (s) □ N/A			
Patent	Joint				
Team	Application	☐ Yes (Joint patent application No.: ☐ N/A			
Official	Expected	1. No. of main claims Agent(s)			
, ''	Number of	2. No. of sub-claims			
	Claims	2. Ito. of boo-bining			
, .	Review				
	Opinion				
	(special				
	remarks)				
	Reporting	Review			
	Officer	Date (Y/M/D)			
	Expected	Application Incidental Examination Fee Expenses Fee Total			
	Cost	Fee Expenses Fee Total			
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PI -01583

Deed of Assignment

Assignee

Name: LG Electronics Inc., Chairman & CEO: Ja-hong Gu Address: 20, Yeonido-dong, Yeongdeungpo-gu, Seoul

I, Young-woo Cho, hereby transfer and assign the right to apply for and obtain patent/utility model registration on the below-mentioned invention (design) to the assignee.

Date: October 12, 1998

	Address	215-704, Jugong A Gunpo, Gyeonggi	Apt. Complex 2, Jaegung-dong, -do			
Assignor (Inventor)	Resident Registration #	670102-1090426				
	Name	Young-woo Cho	Signature			
	Nationality		Republic of Korea			
_		Record				
1: Case Assi	gned	•				
2. Title of In	vention					
(Design)	••	<u> </u>				

^{*} For joint applications, please attach additional deeds of assignment, one per inventor (designer).

LG (23) Teuk001A4 2/10Mo (951106)

LG Electronics

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LPL-01584

4

Deed of Assignment

Assignee

Case 1:04-cv-00343-JJF

Name: LG Electronics Inc., Chairman & CEO: Ja-hong Gu Address: 20, Yeouido-dong, Yeongdeungpo-gu, Seoul

I, Jong-hwan Kim, hereby transfer and assign the right to apply for and obtain patent/utility model registration on the below-mentioned invention (design) to the assignee.

Date: October 12, 1998

•	Address	Mugunghwa Apt. Dongan-gu, Anya	#304-1505, 1057, I ng, Gyeonggi-do	logye-dong,
Assignor (Inventor)	Resident Registration #		630408-1715616	
· .	Name	Jong-hwan Kim	Sign	ature
	Nationality	•	Republic of Korea	· · · ·
	•	Record	• •	
1. Case Assi	gned :	• •		
2. Title of In (Design)	vention			

^{*} For joint applications, please attach additional deeds of assignment, one per inventor (designer).

LG (23) Teuk001A4 2/10Mo (951106)

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PL-001586

Title of the Invention

Method and apparatus for mounting an LCD display module on a notebook computer Objective of the Invention Technological issues the invention is attempting to resolve or remedy.

To provide a method for the stable mounting of an LCD module onto a notebook computer top case and to simplify assembly and boost space efficiency by reducing the space occupied by components in a notebook computer

What is prior art? 1. Technologies or designs which served as a basis to the invention; or 2. Technologies or designs used as a means (method or apparatus) to achieve the stated objective of invention, which are similar to the technologies or designs created by the inventor.

References

1. References can include, in addition to prior art, any informative materials helpful for the understanding of the invention submitted. 2. These supporting materials are absolutely necessary when writing a patent specification and in determining the scope of claims. 3. If you are having difficulties obtaining references, please notify the Patent Team to request a search (use Information Search Request Form).

Ex.: USP 4,567,890/ Patent Publication No. JP 4-123456 A/ SID 95.8 < Title of paper>

Key Features of the Invention (information used when establishing the scope of claims)

1. Apparatus or method created by the inventor as a means to achieve the stated objective of invention

2. Describe your invention by focusing on the differences that distinguish it from existing technologies or designs.

3. List a minimum number of keywords absolutely essential to identifying the invention.

Ex.: [image/ image captions: embodiments, existing apparatus (simple seat)] If you invented stools that can be embodied into the examples shown in the image, the key feature of your invention is the attaching support to existing seats (regardless of their shapes).

1. An LCD module is joined to the top case of a notebook computer using hinge arms placed on the back of the top case, fastened to the back of the module.

The hinge arms of the lower section and the LCD module are fastened together to the rear of the top case in a single process, requiring no additional mounting steps. .

This method of mounting an LCD module onto a top case, by minimizing unused space on

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either side of the case, enables larger-size LCD modules to be fitted.

Keywords: Back hinge arms, module mounting

Benefits of the Invention

- 1. State only benefits offered by the invention (expected shortcomings may be remedied for a new patent application)
- 2. State the improvements brought by your invention.
- 1. This mounting arrangement, requiring only hinge arms on the top case to join the latter with the LCD module, dispenses with other components and contributes to simplicity of assembly.
- 2. As this method minimizes the unused space left on either side of the LCD module and top case, there is more room to accommodate larger LCD modules.

Are there additional benefits or advantages offered by the invention worth mentioning?

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Prior Art

1. For the sake of clarity of description, be sure to attach drawings.

2. State the technological issues and shortcomings resolved or remedied by the invention.

3. When necessary, more than one prior technology or design may be discussed.

Description of Components, Operation and Shortcomings

Drawings

1. Prior Technology L.

Drawing 1.

[Captions: Upper chassis (12), Support plate (14b), Supporting table (14a), LCD display module (14), arm (18), xx screws, xx screws, Hinge (20), Hinge plate (16), Lower chassis (10), Screw (22)

2. Related Technologies

Drawing 2.

[Captions: Support (34a), LCD Display module (34), Hinge arm (38), d, Side (32b), Upper section (32a), Lower chassis (30), Hinge plate (36), Screw (42)]

Prior Technology

Drawing 1 shows an LCD module (14) and an upper chassis (12) joined to a lower chassis (10), such that they can pivot on a hinge (20):

The support plate (14b) of the LCD display module (14) is fastened to the bottom of the upper chassis by a screw, and the binge (20) enables the rotation of the arm (18) situated at one extremity of the hinge plate (16).

The hinge plate (16) is fastened to the lower chassis (10). Using this existing mounting method, the hinge and the LCD module are fastened separately to the upper chassis, requiring superfluous components and complicating assembly. The hinge is contained within the lower chassis, which separates the upper and lower sections.

Related Technologies

Drawing 2 shows a hinge arm attached to the side of the case, which frees up extra space (d) along the side.

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Description of Embodiments

- 1. Describe as many embodiments of the invention as possible.
- 2. Description should be detailed and easy to understand.
- 3. Drawings including sectional view, top view and enlarged view improve the reader's understanding of the description of invention.

Description of Components, Operation and Advantages

Drawing

Description of the Invention (Embodiment 1) Description of other embodiments may be added on at the end of this one.

Embodiment 1.

Embodiment 2.

Embodiment 1.

The hinge (50) is fitted with the arm (58) at one end of the hinge plate (56) on the lower chassis, so as to enable pivoting. The arm is fastened to the protective plastic or metal plate on the back side of the LCD module's display area, using screws, nails or hooks, so that the LCD module is firmly joined with the upper chassis. Thus "d", the size of the gap between the LCD module and the upper chassis, is minimized.

Embodiment 2.

In this embodiment, the hinge is placed in the top case.

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EXHIBIT 17

List of documents: standard disclosure

Notes:

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

in the Patents County Court		
Gláim No.	PAT No. 04022	
Claimant (notating rat)	LG. PHILIPS LED CO., LTD	
Defendant (notating rot)	(1) TATUNG (UK) LTD (2) VIEWSONIC EUROPE LTD (3) NUMBER ONE SERVICES LTD	
Date	(3) NUMBER ONE SERVICES HID	

Disclosure Statement

I state that I have carried out a reasonable and proportionate search to locate all the documents which I am required to disclose under the order made by the court on (insert date) 11 January 2005

(I did not search for documents -

- pre-dating 23 October 1996 or post-dating 23 October 2000
- located elsewhere than LG Philips LCD R&D Centre, 533 Hogae-dong, Dongan-gu, Anyang-shi, Gyongki-do 431-080, Korea
- in categories other than

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty. I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

(I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case.)

N/A

Signed

Date

21 January 2005

(Claimant) (Defendant) ('s litigation friend)

Position or office held(if signing on behalf of furm or company) Please state why you are the appropriate person to make the disclosure statement. LPL-00170

Manager, IP Team 1, LG. PHILIPS LCD CO., LTD. I am the person responsible for managing this action and I have authorisation to sign this document on behalf of the Claimant.

continued overleaf

List of documents:

NZ65 standard disclosure (4.99)



Laserform International 8/99

List and number bere, in a convenient order, the documents (or bundles of documents if of the same nature, e.g. invoices) in your control, which you do not object to being inspected. Give a short description of each document or bundle so that it can be identified, and say if it is kept elsewhere i.e. with a bank or solicitor solicitor.

I have control of the documents numbered and listed here. I do not object to you inspecting them/producing copies.

- 1. LG Electronics LCD Division Invention Disclosure Form dated 13 October 1998, Application No.: AW98-221 (Korean version).
- 2. English Translation of the LG Electronics LCD Division Invention Disclosure Form dated 13 October 1998, Application No.: AW98-221.
- 3. LG Electronics LCD Division Invention Disclosure Form dated 13 October 1998, Application No.: AW98-222 (Korean version).
- 4. English Translation of the LG Electronics LCD Division Invention Disclosure Form dated 13 October 1998, Application No.: AW98-222.

List and number here, as above, the documents in your control which you chiper to being impected. (Rule 31.19) I have control of the documents numbered and listed here, but I object to you inspecting them:

as set out in the attached Schedule A.

Say what your objections are I object to you inspecting these documents because: they are by their nature privileged.

List and number here, the documents you once had in your control, but which you no longer have. For each document fisted, say when it was last in your control and where it is now. I have had the documents numbered and listed below, but they are no longer in my

Originals of correspondence in Schedule A which were last in the Claimant's control on the date they were posted or otherwise despatched to their respective addressees and all documents in the Claimant's control relating to matters in question in these proceedings which have been lost, discarded, mislaid, destroyed or otherwise disposed of from time to time distributed to third parties, on dates not known to the Claimant.

Schedule A

Description No. Correspondence and communications between the Claimant or its Various 1. officers or employees and their legal advisers and its patent agents (including those in the service of the Claiment) of a confidential nature for the purpose of obtaining or providing legal advice and assistance (including advice and assistance in relation to the protection of any invention or technical information) together with memoranda or notes of legal advice given or obtained; and any copies or drafts of the same. Correspondence and communications between the Claimant and/or its Various 2. legal advisers and its patent agents (including those in the service of the Claimant) with all third parties for the purpose of obtaining or collecting evidence or for obtaining information with a view to obtaining such evidence or for the purpose of obtaining or providing legal advice with regard to or in contemplation of legal proceedings; and any copies or drafts of the same. Instructions to Counsel; Counsel's opinions in connection with or in 3. contemplation of these proceedings; notes of conferences and advice provided by Counsel; and any copies or drafts of the same. Drafts of Statements of Case, court documents and related documents, Various 4. proofs of evidence, statements, notes, memoranda and other . documents prepared by the Claimant, its officers, employees and/or its legal advisers and patent agents (including those in the service of the Claimant) for the purpose of and in connection with or in contemplation of these proceedings; and any copies or drafts of the same. Correspondence, memoranda, notes and other documents between Various 5,

the Claimant, its officers or employees and its legal advisers and its patent agents (including those in the service of the Claimant) the dominant purpose of which was the contemplation or furtherance of

litigation; and any copies or drafts of the same.

LN:1884380 10(1)